

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

AT CHARLESTON

UNITED STATES OF AMERICA,

v.

Case No. 2:20-cr-00054

NEDELTCHO VLADIMIROV,

Defendant.

MOTION IN LIMINE NO. 4

Now comes the Defendant, Nedeltcho Vladimirov, by counsel, Timothy J. LaFon, and moves in *Limine* this Honorable Court to enter an Order limiting the United States' ability to enter into evidence conclusory statements by bankers that certain financial transactions conducted by the Defendant were for the purpose of money laundering. In support of said Motion, the Defendant Nedeltcho Vladimirov states as follows:

1. The United States in its Superseding Indictment has accused the Defendant of certain money laundering transactions.
2. Two of these transactions involved include the transferring of money between checking accounts and saving accounts in the name of the Defendant with the ultimate transaction of being a transfer of funds to Bulgaria.
3. The bank representative was questioned about these transactions before the Grand Jury.
4. In addition to asking about what transactions took place, the banker was asked what was the reason for these transactions.
5. There is no way that said banker could know the reason and allowing him to testify that it was for the purpose of money laundering is an improper opinion and conclusory statement.

6. There is not way that the banking witness could know the state of mind or the intent of the Defendant.

7. This is an improper invasion of the purpose of the jury, whose function it is to make these decisions.

8. To allow this testimony would be highly prejudicial and a violation of Rule 403 of the Federal Rules of Evidence.

WHEREFORE, the Defendant requests the Honorable Court to enter an Order preventing the United States' ability to introduce evidence the banking witness' opinion as to what the purpose of said transactions were. The Defendant requests such other and further relief as this Court deems just.

NEDELTCHO VLADIMIROV

By Counsel,

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon
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CERTIFICATE OF SERVICE

I, Timothy J. LaFon, do hereby certify that the foregoing “**Motion in Limine No. 4**” has been served upon all parties via the Court’s electronic filing system on the 29th day of June, 2021:

Andrew Tessman, Esquire
United States Attorney’s Office
P.O. Box 1713
Charleston, West Virginia 25326

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon
Timothy J. LaFon (WV #2123)
Attorney for Defendant